HONORABLE RICHARD A. JONES 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 UNITED STATES OF AMERICA, Case No. CR18-0092-RAJ 10 Plaintiff, UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING POST-TRIAL v. 11 **MOTIONS** BERNARD ROSS HANSEN, and 12 DIANE RENEE ERDMANN, NOTING DATE: August 6, 2021 13 Defendants. 14 15 16 Counsel for Defendants Bernard Ross Hansen and Diane Renee Erdmann hereby move the 17 Court to extend time within which the defendants may file any post-trial motions pursuant to Rules 18 29(c)(1) and 33 of the Federal Rules of Criminal Procedure from August 13, 2021 to September 10, 19 2021. 20 The current deadline for filing motions under Rules 29(c)(1) and 33 is on or before 21 August 13, 2021—within fourteen days after the jury returned its verdict on July 30, 2021. The 22 defendants respectfully request and the government does not oppose an extension of that deadline 23 to September 10, 2021, to allow the defendants additional time to prepare and file any such motions. 24 // 25 LAW OFFICES UNOPPOSED MOTION TO EXTEND CALFO EAKES LLP DEADLINE FOR FILING POST-TRIAL 1301 SECOND AVENUE, SUITE 2800

MOTIONS

(Case No. 18-cr-0092-RAJ) - 1

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For the above reasons, defendants respectfully request that the deadline to file motions under 1 Rules 29(c)(1) and 33 shall be extended to on or before September 10, 2021. 2 Dated this 6th day of August, 2021. 3 Respectfully submitted, 4 CALFO EAKES LLP 5 CORR CRONIN LLP 6 By: s/Angelo J. Calfo By: s/Steven W. Fogg Angelo J. Calfo, WSBA No. 27079 Steven W. Fogg, WSBA No. 23528 7 Patty Eakes, WSBA No. 18888 Benjamin C. Byers, WSBA No. 52299 Anna F. Cavnar, WSBA No. 54413 1001 Fourth Avenue, Suite 3900 8 Henry C. Phillips, WSBA No. 55152 Seattle, Washington 98154 1301 Second Avenue, Suite 2800 (206) 625-8600 Phone 9 Seattle, WA 98101 (206) 625-0900 Fax 10 Telephone: (206) 407-2200 sfogg@correronin.com Fax: (206) 407-2224 bbyers@corrcronin.com 11 angeloc@calfoeakes.com pattye@calfoeakes.com AOKI LAW PLLC 12 annac@calfoeakes.com henryp@calfoeakes.com By: s/Russell M. Aoki 13 Russell M. Aoki, WSBA No. 15717 Attorneys for Defendant Bernard Ross Isham Reavis, WSBA No. 45281 14 Hansen 1200 Fifth Avenue, Suite 750 Seattle, Washington 98101 15 (206) 624-1900 Phone 16 (206) 442-4396 russ@aokilaw.com 17 isham@aokilaw.com 18 Attorneys for Defendant Diane Renee Erdmann 19 20 21 22 23 24 25

UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING POST-TRIAL MOTIONS (Case No. 18-cr-0092-RAJ) - 2 LAW OFFICES

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